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Lockheed Shipbuilding Company

2929 Sixteenth Avenue S.W., Seattle, Washington 98134

October 15, 1986

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Superfund Branch

Ms. Lori Cohen
U. S. Environmental Protection Agency
Superfund Branch
1200 Sixth Avenue, M/S 525
Seattle, WA 98101

Re: Harbor Island Superfund Site

Dear Ms. Cohen:

In response to Mr. Findley's letter of July 31, 1986, Lockheed Shipbuilding Company ("LSC") herewith provides responses to items 1 through 10. However, LSC is concerned by the EPA's designation of it as a potentially responsible party of the Harbor Island Superfund Site. LSC's concern is founded on two unanswered questions: 1) What are the precise boundaries of the "site" at which EPA has documented release or threatened release of hazardous substances? and 2) What information does EPA possess that connects LSC with the potential release of hazardous substances at the "site"? The following responses assume the site to be LSC premises only for the purposes of this letter. LSC reserves the right to contest any determination that it is connected with the referenced "site" or is a potentially responsible party.

Because LSC does not believe it is connected in any way with the above-referenced "site", we hereby request, pursuant to the Freedom of Information Act, 5 U.S.C. §552, all documents in the EPA's possession which:

- 1) define the Harbor Island Superfund Site
- 2) describe the release or threatened release of hazardous substances at the site
- 3) identify any such hazardous substance
- 4) show any connection between LSC and the preceding two items

Response to Item No. 1

LSC does not lease any company-owned property on Harbor Island. (See LSC's letter dated August 8, 1986.)

Response to Item No. 2

In the process of shipbuilding and repair work, LSC has used paints, solvents, and various corrosive chemicals at our Harbor Island facility. As required by OSHA, Hazard Communication regulations, a list of chemicals and paints currently in use has been prepared. The list includes generic names of chemicals and other information concerning ingredients of more than 950 chemicals and paints. We have no information about similar substances used historically. (Attached)

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Response to Item No. 3

Paints and solvents are the principal hazardous materials used during shipbuilding and repair operations. Available data concerning quantities of these materials used historically is scarce. It has been estimated that we used more than 70,000 gallons of paints, and 15,000 gallons of solvents in 1984. Paint usage in 1985 was estimated at nearly 37,000 gallons with solvent usage about 12,000 gallons. Total usage data for paint, chemical and solvent usage in previous years is not available.

Response to Item No. 4

Paints, solvents, and other flammable materials have been stored in flammable materials storage facilities at our Harbor Island Yard. Other chemicals characterized as non-flammable have been stored in our warehouse facility located at this site. Since the implementation of RCRA, regulations, waste paints and solvents have been disposed of in accordance with state and federal hazardous waste regulations at a permitted disposal site. Manifest records of this disposal activity are retained for the required three-year period. Except for our disposal of certain wastes at Western Processing and at Queen City Farms during the late 1970's, we have no information on disposal activities.

Response to Item No. 5

(See attached sheet for names and addresses of transporters.)

Response to Item No. 6

LSC uses, and has historically used, substantial volumes of paints and solvents, as indicated in paragraph 3 supra. In light of this, relevant LSC personnel have no knowledge of hazardous material spills, releases, or disposal on the premises requiring any action, including clean-up, notification, reporting or EPA enforcement proceedings. A search of records currently held supports this conclusion.

Response to Item No. 7

To our knowledge the following environmental investigations have taken place at our Harbor Island facility.

1. On December 2-3, 1982, personnel from CH₂M-Hill collected samples of sediment, estuary water, and storm water in the vicinity of LSC operations on the Duwamish River. Results were summarized in a report dated December 30, 1982.
2. Samples of storm water in selected storm drains were taken for analysis of EP toxicity metals in 1985 and 1986.

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3. Samples of copper slag abrasive blasting grit (new and waste material) were analyzed for EP toxicity metals.
4. A review of LSC hazardous materials handling procedures was performed by the DuPont Company in 1983.
5. Inspections by Washington Industrial Safety and Health Program Compliance officers have included samples of airborne contaminants in yard work areas. Results of these tests are on file at the local WISHA offices.
6. Periodic sampling of waste water discharged to the Metro sewer via the oil skimmer has been performed to measure oil contamination.
7. LSC is aware of other studies of the Duwamish River estuary and Elliott Bay done by Washington Department of Ecology, Puget Sound Water Quality and Authority, and Metro. Copies of these studies are on file at the local EPA office and at WDOE.

Response to Item No. 8

There are no wells on the LSC property on Harbor Island.

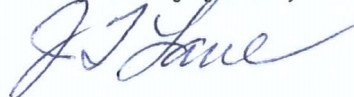
Response to Item No. 9

See answer to Item No. 1.

Response to Item No. 10.

LSC is reluctant to specify insurance policies which may provide coverage for hazardous waste liability since this is a legal determination properly made by the particular carrier involved. Copies of all policies naming LSC as insured are kept with LaBow Haynes Company and can be made available for inspection by the EPA upon request.

Very truly yours,



J. T. Lane
Manager, Industrial Safety
& Environmental Programs

Enclosures

LOCKHEED SHIPBUILDING COMPANY
TRANSPORTERS

NOTE: The following hazardous waste transporters and disposal firms have been reported on Generator Annual Dangerous Waste Reports to Washington State Department of Ecology.

Crosby & Overton, Inc.
20245 76th Avenue S.
P.O. 1Box 1085
Kent, WA 98032

Chemical Processors
734 Lucille Street
Seattle, WA 98108

Resource Recovery
5501 Airport Way South
Seattle, WA 98108

Chemical Processors
1701 Alexander St.
Tacoma, WA

Northwest Environmental Services*
1500 Airport Way South
Seattle, WA 98134
* Formerly Northwest Tank Service

Chem-Security Systems, Inc.
Star Route
Arlington, Oregon 97812

General Electric Co.
2531 S.W. 28th Avenue
Portland, Oregon 97210

Amalgamated Services, Inc.
21318 103rd Place S.E.
Kent, WA 98031